

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,
Plaintiff,

v.

REBUILT BROKERAGE LLC D/B/A
REBUILT REALTY AND REBUILT
OFFERS LLC
Defendant.

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Case No. 1:24-cv-504-RP

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Rebuilt Brokerage LLC d/b/a Rebuilt Realty and Rebuilt Offers, LLC ("Defendants"), and files this Unopposed Motion for Extension of Time as follows:

I.

1. Plaintiff filed suit on May 11, 2024. Doc. 1.
2. Defendants were served on May 14, 2024. Doc. 3.
3. Defendants' response(s) to Plaintiff's Complaint are currently due on June 4, 2024.
4. Defendants are still investigating this matter and have retained the undersigned counsel to represent them in this matter.
5. As Defendants' investigation is ongoing, Defendants request additional time to complete the investigation prior to filing their response to Plaintiff's Complaint.
6. To this end, Defendants request an extension of twenty-one (21) days to file a response to Plaintiff's Complaint, up to and including June 25, 2024.
7. This is Defendants' first request for an extension of time as to this deadline, and extending this deadline will not conflict with any other deadlines in this matter.
8. Plaintiff is unopposed to the relief requested here.

WHEREFORE, PREMISES CONSIDERED, Defendants Rebuilt Brokerage, LLC, and Rebuilt Offers, LLC, respectfully requests that this Court grant this Unopposed Motion for Extension of Time and extend the deadline for Defendants' Response(s) to Plaintiff's Complaint up to and including June 25, 2024.

Respectfully submitted,

MARTIN LYONS WATTS MORGAN PLLC

/s/ Xerxes Martin

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***COUNSEL FOR DEFENDANT
CREDIT CONTROL, LLC***

CERTIFICATE OF CONFERENCE

On May 28, 2024, counsel for Defendants communicated with counsel for Plaintiff via email regarding this Motion. Plaintiff is unopposed to the relief requested herein.

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded via **CM/ECF** system to all parties entitled to notice of the same on this 3rd day of June, 2024.

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV